

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FREE SPEECH COALITION, INC., et al.,

Plaintiffs,

v.

ANGELA COLMENERO, In Her Official
Capacity As Interim Attorney General For
The State Of Texas

Defendant.

CASE NO. 1:23-cv-00917-DAE

REBUTTAL DECLARATION OF SADIQ MUHAMED IN SUPPORT OF PLAINTIFFS'
MOTION FOR EXPEDITED PRELIMINARY INJUNCTION

I, Sadiq Muhamed, declare as follows:

1. I provide this declaration in support of the Motion for Expedited Preliminary Injunction against enforcement of the Act of June 12, 2023, Ch. 676, § 2 (H.B. 1181) Tex. Sess. Law Serv. (“the Act”). I am over eighteen years of age, and I have personal knowledge of the matters set forth in this Declaration; if called as a witness I could and would testify competently to these matters.

2. I have reviewed Defendant’s Opposition to Plaintiffs’ Motion, as well as the Declaration of Erik Cabrera.

3. Mr. Cabrera claims that he visited MYLF.com and TeamSkeet.com, and that “[t]he landing pages of those websites likewise show pictures of videos that you can click on to view. However, you can only view short previews, and if you click on the videos, you are taken immediately to a screen that requests payment.” Cabrera Decl. at ¶ 17.

4. Mr. Cabrera’s description does not fully describe these sites’ landing pages. The landing pages for both sites include both pictures and videos, which can be up to three minutes long. In addition, clicking on a video takes you to a preview of that video, under which the option is given to subscribe to the site for full access.

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5. Separately, Defendant's Opposition suggests that all the content on MYLF.com and TeamSkeet.com wholly appeals to the prurient interest, lacks artistic value, and is patently offensive under contemporary community standards. Opp. at p. 6. I have not been able to identify evidence for this claim about MYLF.com or TeamSkeet.com in the Opposition or Mr. Cabrera's Declaration. Nevertheless, among the content offered on both sites is content that is minimally sexual, such as image galleries featuring models both fully clothed and in the nude, without penetration, masturbation, or the presence of another model.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 21, 2023 in Miami, Florida

Dated: August 21, 2023

/s/ Sadiq Muhamed
Sadiq Muhamed